

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

Franklin A. Rothman
Jeremy Schneider
Robert A. Soloway
David Stern

Tel: (212) 571-5500
Fax: (212) 571-5500

Rachel Perillo

September 22, 2020

Via ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Mustapha Raji
19 Cr. 870 (JMF)

Dear Judge Furman:

I am the attorney for Mustapha Raji, the defendant in the above-referenced matter. On May 27, 2020, the Court ordered Mr. Raji's release on bail subject to a \$100,000 personal recognizance bond to be signed by three financially responsible persons and secured by \$10,000 in collateral. On July 27, 2020, the Court's Order was modified to require two financially responsible co-signers and one moral suasion co-signer. Mr. Raji was released from custody on August 19, 2020, and is now residing at his home in Hollywood, Florida. His bond conditions restrict travel to the Southern and Eastern Districts of New York and the Southern District of Florida (with the approval of Pretrial Services to districts in between for the purposes of traveling between the foregoing districts).

This letter is respectfully submitted with the consent of Pretrial Services of the Southern District of Florida, and the government, by AUSA Dina McCleod, to request a permanent bond modification expanding Mr. Raji's travel restrictions to include the Middle District of Florida. As the Court is aware from counsel's previous applications, Mr. Raji has been receiving medical treatment at the Orlando Health Heart Institute in Orlando, Florida, where he was most recently treated on September 17, 2020. He now has appointments scheduled for September 24, 2020 and October 7, 2020. Due to the expected frequency of these appointments in the future, it is respectfully requested that Mr. Raji's bond be modified to permit travel to the Middle District of Florida for purposes of receiving medical treatment in Orlando, with the condition that he must notify Pretrial Services in advance of his travels.

Hon. Jesse M. Furman
September 22, 2020
Page Two

If the Court has any questions regarding this application, please contact my office.

Respectfully submitted,

/s/

Jeremy Schneider

cc: AUSA Dina McCleod (By ECF)
AUSA Eun Young Choi (By ECF)
USPO Jason Jacoby (By ECF)